

1 THE HONORABLE RONALD B. LEIGHTON  
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7 UNITED STATES DISTRICT COURT  
8 WESTERN DISTRICT OF WASHINGTON  
9 AT TACOMA

10 MICHAEL ELLIOTT,

11 Plaintiff,

12 v.

13 BNSF RAILWAY COMPANY, a Delaware  
14 corporation,

Defendant.

) Case No. 14-CV-05054-RBL

**DECLARATION OF SARA  
JOHNSON**

I, Sara Johnson, make this declaration

1. I am the Director of Crew Management, Transportation – NW Division for  
2 BNSF Railway Company. I am of legal age, am competent to testify and make this declaration  
3 from my own personal knowledge.

2. I have reviewed plaintiff's requests for production that seeks the production of  
3 complete personnel files and employee rosters of all employees who were under Dennis  
4 Kautzmann's direct or indirect supervision since January 1, 2004.

3. There are currently 774 BNSF employees in the Northwest Division. Although  
4 I am able to locate and pull the rosters of those employees, I am unable to filter or limit the  
5 search of those 774 employees to those individuals who may have been supervised directly or  
6 indirectly by a specific employee such as Mr. Kautzmann. Moreover, the employee rosters and  
7 personnel files do not contain information that would allow an individual such as myself to

27 DECLARATION OF SARA JOHNSON - 1

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1 determine who supervised the employee. Accordingly, it is not possible to comply with  
2 plaintiff's request to produce personnel files and employee rosters for employees who may  
3 have been supervised by Mr. Kautzmann.

4       4. I attempted to comply with plaintiff's request for production by trying to match  
5 employee rosters with available payroll records that date back to 2007. This attempt was  
6 unsuccessful, as there is no way to confirm an individual was supervised by a specific  
7 employee using the records that are available to BNSF.

8           I declare under penalty of perjury under the laws of the United States that the foregoing  
9 is true and correct.

10           DATED: March 2, 2015

11           By \_\_\_\_\_  
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15           Sara Johnson  
16           Director of Crew Management,  
17           Transportation – NW Division for BNSF  
18           Railway Company

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27           DECLARATION OF SARA JOHNSON - 2

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## **CERTIFICATE OF SERVICE**

Pursuant to RCW 9.A.72.085, the undersigned certifies under penalty of perjury under the laws of the State of Washington, that on the 2nd day of March, 2015, the document attached hereto was presented to the Clerk of the Court for filing and uploading to the CM/ECF system. In accordance with their ECF registration agreement and the Court's rules, the Clerk of the Court will send e-mail notification of such filing to the following persons:

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Executed on the 2nd day of March, 2015, at Seattle, Washington.

JOSEPH P. CORR  
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**DECLARATION OF SARA JOHNSON - 3**

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